

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a California
Corporation,

Plaintiff,

v.

INTERNET SECURITY SYSTEMS, INC.,
a Delaware corporation, INTERNET
SECURITY SYSTEMS, INC., a Georgia
corporation, and SYMANTEC
CORPORATION, a Delaware corporation,

Defendants.

Case No. 04-1199-SLR

**SRI INTERNATIONAL, INC.'S THIRD NOTICE OF DEPOSITION
PURSUANT TO FED. R. CIV. P. 30(b)(6) TO INTERNET SECURITY
SYSTEMS, INC., A DELAWARE CORPORATION, AND INTERNET
SECURITY SYSTEMS, INC., A GEORGIA CORPORATION**

TO DEFENDANTS INTERNET SECURITY SYSTEM, INC., A DELAWARE
CORPORATION, AND INTERNET SECURITY SYSTEM, INC., A GEORGIA
CORPORATION, BY AND THROUGH THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, plaintiff SRI International, Inc. ("SRI") will take the depositions of defendants Internet Security Systems, Inc., a Delaware corporation, and Internet Security Systems, Inc., a Georgia Corporation (collectively "ISS"), at a mutually agreed upon location, commencing at 9:30 a.m. on April 15, 2006 or at another time agreed upon by the parties, or ordered by the Court. The deposition will continue from day to day thereafter until complete. The deposition will take place upon oral examination pursuant to the Federal Rules of Civil Procedure before an officer duly authorized by law to administer oaths and record testimony. Some or all of the deposition testimony may be recorded stenographically and may be recorded by videotape. Some or all of the

deposition testimony may involve real-time computer connection between the deposition taker and stenographer using software such as "LiveNote."

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, ISS is obligated to designate one or more of its officers, directors, or managing agents, and/or one or more other persons who consent to testify on its behalf concerning the matters set forth in Attachment A. ISS is requested to set forth, for each person designated, the matters on which the person will testify.

Dated: March 21, 2006

FISH & RICHARDSON P.C.

By: /s/ John F. Horvath

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SRI INTERNATIONAL, INC.

ATTACHMENT A

DEFINITIONS AND INSTRUCTIONS

1. “SRI” means SRI International, Inc., including its officers, directors, employees, agents, and attorneys.
2. “ISS” “Defendants,” “you,” or “your” means Internet Security Systems, Inc., a Delaware corporation, and Internet Security Systems, Inc., a Georgia corporation, including their past and present officers, directors, employees, consultants, agents, and attorneys and others acting or purporting to act on their behalf, and including their predecessors, subsidiaries, parents, and affiliates.
3. “Symantec” means Symantec Corp., a Delaware corporation, including their past and present officers, directors, employees, consultants, agents, and attorneys and others acting or purporting to act on their behalf, and including their predecessors, subsidiaries, parents, and affiliates.
4. The phrase “Accused Products” means those products identified in ISS’ responses to SRI Interrogatory No. 1 and Natasha A. Moffitt’s September 6, 2005 and August 16, 2005 letters to Michael J. Curley.
5. The word “Document” is used herein in its broadest sense to include everything that is contemplated by Rule 26 and Rule 34 of the Federal Rules of Civil Procedure, including Documents stored in hard copy or electronic form. Electronic Documents include electronic mail, computer source code, object code, and microcode, and Documents stored on any media accessible by electronic means. A comment or notation appearing on any “Document” and not a part of the original text is to be considered a separate “Document”.
6. “Thing” means any tangible object other than a Document.
7. “Person” or “Persons” include not only natural individuals, but also, without limitation, firms, partnerships, associations, corporations, and other legal entities, and divisions, departments, or other units thereof.

8. “Including” shall mean “including but not limited to.”
9. The terms “and” and “or” shall be construed conjunctively or disjunctively, whichever makes the individual request more inclusive.
10. The singular and masculine form of any noun or pronoun shall embrace and be read and applied as embracing the plural, the feminine, and the neuter, except where circumstances clearly make it inappropriate.
11. “Concerning” means relating to, referring to, describing, discussing, depicting, evidencing, identifying or constituting.
12. The terms “refer,” “referring,” “relate,” or “relating” as used herein include, but are not limited to the following meanings: bearing upon, concerning, constituting, discussing, describing, evidencing, identifying, concerning, mentioning, in connection with, pertaining to, respecting, regarding, responding to, or in any way factually or logically relevant to the matter described in the request.

TOPICS

31. All communications between ISS and Symantec, including without limitation their attorneys, agents, and representatives, relating to the RealSecure and Proventia line of products, including without limitation, all communications concerning topics 1 through 8 of Symantec's 30(b)(6) notice to depose ISS.

32. All communications between ISS and Symantec, including without limitation their attorneys, agents, and representatives, relating to the ManHunt, Symantec Network Security 7100 Series, iForce, Symantec Gateway Security 5400 Series and Blackbird lines of products, including without limitation, all communications concerning topics 1 and 2 of ISS's 30(b)(6) notice to depose Symantec.

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March 2006 , I electronically filed **SRI INTERNATIONAL, INC.'S THIRD NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(B)(6) TO INTERNET SECURITY SYSTEM, INC., A DELAWARE CORPORATION, AND INTERNET SECURITY SYSTEM, INC., A GEORGIA CORPORATION** using CM/ECF which will send notification of the filing to the following Delaware counsel. A copy of the document will also be hand-delivered.

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I also certify that on March 21, 2006, I mailed by United States Postal Service and by electronic mail, the above document(s) to the following non-registered participants:

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